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July 13, 2011

Honorable Cheryl L. Pollak
United States District Court, EDNY
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Zimmerman, et al. v. Poly Prep, CDS, et al. – 09-CIV-04586-FB-CLP:
Plaintiffs' Second Amended Complaint**

Dear Judge Pollak:

Please be advised that I will be serving Plaintiffs' Second Amended Complaint on Defendants' counsel either late evening today or tomorrow (depending on when I receive the transcript of Mr. Sheridan's July 7, 2011 deposition from my court reporter service).

As the Second Amended Complaint contains ample information of a sensitive and confidential nature as to the identity of several sexual abuse victims and details involving particular abuse incidents, I will shortly be filing the original Second Amended Complaint with the Court "Under Seal."

Thereafter, counsel for the Defendants and I will confer and attempt to reach an agreement as to the particular sections of the Second Amended Complaint which will need to be redacted prior to our electronic filing of the pleading via ECF. If, as expected, we are able to agree on that issue, we will send the Court a letter outlining the reasons for each of the redactions and then, upon the Court's endorsement, electronically file the redacted pleading.

If acceptable to the Court, kindly endorse this proposed timetable and procedure for service and filing.

We also look forward to more fully updating Your Honor as to the status of this case at the July 15, 2011 status conference.

Thank you for your consideration.

Sincerely,


KEVIN THOMAS MULHEARN (KM 2301)

cc: Jeffrey I. Kohn, Esq.

So Ordered
C. Pollak
usmt
7/13/11